

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

J&N PUBLISHING, LLC, et al.

Plaintiffs

v.

3508 EASTERN, LLC, et al.

Defendants

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Case No.: 1:19-cv-00582-ELH

**CONSENT MOTION TO ADMINISTRATIVELY CLOSE CASE
AND OTHERWISE STAY PROCEEDINGS
PENDING PERFORMANCE OF SETTLEMENT**

Plaintiffs, J&N Publishing, LLC, d/b/a Juan & Nelson Publishing, and Premium Latin Publishing Inc., and Defendants, 3508 Eastern, LLC d/b/a Carlos O'Charlie's, Ivan R. Brown and Carlos Cruz, through their respective undersigned counsel, jointly move for an order administratively closing this case in light of the parties' settlement, with the Court maintaining jurisdiction over the case and otherwise staying the proceedings for sixty (60) days pending the parties' performance of the their settlement agreement and in support thereof state as follows.

1. The parties have settled their dispute and are in the process of executing the settlement documents. The parties' settlement, the terms of which the parties desire to remain confidential, requires performance that is anticipated to conclude within sixty (60) days.

2. Accordingly, the parties jointly request that the Court enter an order administratively closing the case but maintaining jurisdiction over it for sixty (60) days from the date of the order granting this motion. At the conclusion of the 60-day period, if the parties have not already made the appropriate filing dismissing or otherwise closing out the case, they shall jointly report to the Court as to the status of the performance under the settlement agreement.

WHEREFORE, Plaintiffs, J&N Publishing, LLC d/b/a Juan & Nelson Publishing, and Premium Latin Publishing Inc., and Defendants, 3508 Eastern, LLC d/b/a Carlos O'Charlie's, Ivan R. Brown and Carlos Cruz, by their respective undersigned counsel, respectfully request that this Court grant this consent motion and enter an order that:

1. Administratively closes the case, with the Court maintaining jurisdiction over it in the interim;
2. Staying all proceedings for sixty (60) days from the date of this order;
3. Requires the parties to file a joint status report at the conclusion of the 60-day period, unless they have already made the appropriate filing dismissing or otherwise closing out the case; and
4. Grants the parties such further or alternative relief that effectuates their stated purpose for the relief requested and judicial economy.

Date: June 28, 2019

Respectfully submitted,

/s/ [with permission]
Linda J. Zirkelbach (Fed. Bar No. 14643)
Venable LLP
600 Massachusetts Avenue, N.W.
Washington, D.C. 20001
ljzirkelbach@venable.com
Telephone: (202) 344-4000
Facsimile: (202) 344-8300

Heather L. Mitchell (Fed. Bar No. 027169)
Venable LLP
750 E. Pratt Street, Suite 900
Baltimore, Maryland 21202
hlmitchell@venable.com
Telephone: (410) 244-7681
Facsimile: (410) 244-7742

*Counsel for Plaintiffs J&N Publishing, LLC d/b/a
Juan & Nelson Publishing, and Premium Latin
Publishing Inc.*

/s/ Jason C. Brino
Jason C. Brino (Fed. Bar No. 23535)
brino@bowie-jensen.com
Gina M. Harasti (Fed. Bar No. 09680)
harasti@bowie-jensen.com
BOWIE & JENSEN, LLC
210 West Pennsylvania Ave., Suite 400
Towson, Maryland 21204
Phone: (410) 583-2400
Fax: (410) 583-2437

*Counsel for Defendants, 3508 Eastern, LLC
d/b/a Carlos O'Charlie's, Ivan R. Brown
and Carlos Cruz*